

OPEN MEETING AGENDA ITEM
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Solar Advocates
Arizona Solar Energy Industries Association
Solar Alliance
Vote Solar Initiative



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**Exceptions to Staff Recommended Order and Opinion Regarding TEP
REST Implementation Plan
(Docket No. E-01933A-07-0594)**

ARIZONA CORPORATION COMMISSION
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The Solar Advocates appreciate the efforts of Commission Staff in drafting the Recommended Order and Opinion (ROO) for Tucson Electric Power. We feel that the ROO goes a long way toward creating a plan that insists on full compliance with REST mandates, while at the same time limiting unnecessary costs.

Our proposed exceptions are primarily related to concerns associated with administration and process details. Several of the specific interconnection and program details that are outlined in both versions, and that would remain should the staff ROO be approved, would result in a cumbersome program with significant potential to discourage participation.

Exception 1

Page 7, Line 22 Insert:

With regard to the proposed Renewable Energy Credit Purchase Program (RECPP) installation guidelines for photovoltaic systems: TEP shall adopt those guidelines set forth in Option 3 of TEP's current SunShare program. These installation guidelines shall be modified to conform to changes suggested by staff in Sections 25 and 26.

Explanation

The Solar Advocates believe that the above exception is necessary because of our objections to several changes to the solar installation guidelines in TEP's proposed RECPP program, two of which are commented on below.

The above exception also prevents the need for short-term onerous changes that will most likely be superseded by the Uniform Credit Purchase Program Rulemaking in a matter of months.

- *In no case will PV Modules be mounted less than 4 inches above any surface and an additional inch of clearance for each foot of continuous array surface beyond four feet in the direction parallel to the mounting support surface.*

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This is unnecessarily restrictive. This provision would completely eliminate the use of:

- Building integrated PV
- Thin film on standing seam metal roofs.
- Traditional flat plate modules on standing seam metal roofs. These systems clamp onto the seam without roof penetrations but are often less than 4 inches from where they connect to the seam.
- The provision calling for “an additional inch of clearance for each foot of continuous array surface beyond for feet....” is very troubling. A 10 kW system arranged in a square or rectangular shape might have to be 2 to 3 feet off the roof surface even if it is a sloped roof. It is difficult to imagine that many homeowners would purchase such a system. **This could prove to be a huge obstacle.**

- REC PP, Page 34 – Second Paragraph (Item 7)
 - *The customer shall verify and demonstrate to Company the proper calibration and operation, through a temporary data monitor and acquisition system, of the solar insolation sensor, the ambient temperature sensor, the wind speed sensor and the AC power meter within +/- 2% of Company independent sensor data.*

TEP outlines a process wherein a customer would use a temporary data monitor and acquisition system to calibrate “the solar isolation sensor, the ambient temperature sensor, the wind speed sensor, and the AC power meter. This exercise and this equipment is unnecessary, costly, and unduly burdensome. The only relevant metric is the output of the system—and that’s being measured separately, and that’s what provides the basis for the REC payment. We recommend that items 6 through 9 of attachment C be deleted.

Exception 2

Page 8, Line 5 – Insert

The Commission supports development of Renewable Energy Service Agreements (RESA), wherein a third party installs, owns, and operates a renewable energy system on the behalf of a customer, as a means of acquiring distributed renewable resources through TEP’s. Renewable Energy Credit Purchase Plan.

Explanation

It is critical for the realization of REST goals and the efficient use of Commission time and energy that companies enter into these third party contracts or RESAs not be regulated as a public utility. The above exception, while not directly addressing this issue, does give companies seeking enter into RESAs some assurance that the Commission is supportive of these types of agreements.